

Table of Contents and Index of Commenters

I.A.1.a. Minimum Size Requirement.....	3
Overview.....	3
Asset Guarantee Insurance Company (FTMP-00003).....	4
Frieh Insurance Corporation (FTMP-00008).....	6
Browning-Ferris industries(FTMP-00010).....	9
Environmental Compliance Services, Inc. (FTMP-00011).....	9
The Solid Waste Association of North America (FTMP-00013).....	10
Texas Natural Resource Conservation Commission (FTMP-00018).....	12
Duff & Phelps Capital Markets Company (FTMP-00019).....	12
National Solid Wastes Management Association (FTMP-00020).....	16
National Solid Wastes Management Association (FTMP-00020).....	18
National Solid Wastes Management Association (FTMP-00020).....	19
City of Santa Clarita, California (Burke, Williams & Sorensen) (FTMP-00021).....	20
Land and Lakes Company (FTMP-00024).....	22
Land and Lakes Company (FTMP-00024).....	23
Land and Lakes Company (FTMP-00024).....	24
Granger Companies, Inc. (FTMP-00025).....	26
 I.A.1.b. Bond Rating/Financial Ratio Alternatives.....	 28
Asset Guarantee Insurance Company (FTMP-00003).....	28
Browning-Ferris Industries (FTMP-00010).....	29
The Solid Waste Management Association of North America (FTMP-00013).....	30
Texas Natural Resource Conservation Commission (FTMP-00018).....	31
National Solid Wastes Management Association (FTMP-00020).....	32
City of Santa Clarita, California (Burke, Williams & Sorensen) (FTMP-00021).....	31
Land and Lakes Company (FTMP-00024).....	34
Land and Lakes Company (FTMP-00024).....	35
William R. Lambert (FTMP-L0003).....	36
 I.A.1.c. Domestic Asset Requirement.....	 39
Browning-Ferris Industries (FTMP-00010).....	39
The Solid Waste Association of North America (FTMP-00013).....	40
Texas Natural Resource Conservation Commission (FTMP-00018).....	41
National Solid Wastes Management Association (FTMP-00020).....	41
City of Santa Clarita, California (Burke, Williams & Sorensen) (FTMP-00021).....	42
California Integrated Waste Management Board (FTMP-00023).....	42
Land and Lakes Company (FTMP-00024).....	44
Waste Management, Inc. (FTMP-L0001).....	44

I.A.2. Recordkeeping and Reporting.....	46
The Solid Waste Association of North America (FTMP-00013).....	46
Texas Natural Resource Conservation Commission (FTMP-00018).....	46
I.A.2.a. Chief Financial Officer (CFO) Letter.....	47
Texas Natural Resource Conservation Commission (FTMP-00018).....	47
National Solid Wastes Management Association (FTMP-00020).....	47
Waste Management, Inc. (FTMP-L0001).....	48
I.A.2.b. Accountant's Opinion.....	49
Browning-Ferris Industries (FTMP-00010).....	49
Texas Natural Resource Conservation Commission (FTMP-00018).....	50
National Solid Wastes Management Association (FTMP-00020).....	50
Texas Natural Resource Conservation Commission (FTMP-00018).....	50
National Solid Wastes Management Association (FTMP-00020).....	50
Land and Lakes Company (FTMP-00024).....	51
I.A.2.c. Special Report from the independent Certified Public Accountant.....	52
American Institute of Certified Public Accountants (FTMP-00009).....	52
American Institute of Certified Public Accountants (FTMP-00009).....	53
Texas Natural resource Conservation Commission (FTMP-00018).....	55
National Solid Wastes Management Association (FTMP-00020).....	56
I.A.2.d. Annual Updates and Placement of Financial Test Documentation.....	57
Texas Natural Resource Conservation Commission (FTMP-00018).....	57
National Solid Wastes Management Association (FTMP-00020).....	57
Land and Lakes Company (FTMP-00024).....	58
I.A.2.e. Alternate Financial Assurance.....	59
Texas Natural Resource Conservation Commission (FTMP-00018).....	59
National Solid Wastes Management Association (FTMP-00020).....	60
I.A.2.f. Current Financial Test Documentation.....	61
Texas Natural Resource Conservation Commission (FTMP-00018).....	61
National Solid Wastes Management Association (FTMP-00020).....	61
Land and Lakes Company (FTMP-00024).....	62
I.B. Corporate Guarantee.....	64
Frieh Insurance Company (FTMP-00008).....	64
Browning-Ferris Industries (FTMP-00010).....	64
The Solid Waste Association of America (FTMP-00013).....	65
Texas Natural Resource Conservation Commission (FTMP-00018).....	66

National Solid Wastes Management Association (FTMP-00020).....	68
Land and Lakes Company (FTMP-00024).....	68
I.C. Calculation of Obligations.....	70
Texas Natural Resource Conservation Commission (FTMP-00018).....	70
II. Domestic Asset Requirement for the Subtitle C Corporate Financial Test.....	71
Browning-Ferris Industries (FTMP-00010).....	71
Safety-Kleen Corporation (FTMP-00015).....	72
Chemical Manufacturers Association (FTMP-00017).....	72
Texas Natural Resource Conservation Commission (FTMP-00018).....	73
National Solid Wastes Management Association (FTMP-00020).....	73
John Phillip Taylor (FTMP-00022).....	74
California Integrated Waste Management Board (FTMP-00023).....	74
Waste Management, Inc. (FTMP-L0001).....	75
Waste Management, Inc.(FTMP-L0001).....	75
III.A.1. Minimum Net Worth Requirement.....	77
No comments	
III.A.2. Develop and Analyze Alternative Financial Test.....	78
Asset Guarantee Insurance Company (FTMP-00003).....	78
III.A.3. Select a Financial Test for a Proposal.....	80
No comments	
III.B.1. Firm Samples.....	81
National Solid Wastes Management Association (FTMP-00020).....	81
Land and Lakes Company (FTMP-00024).....	82
Waste Management, Inc. (FTMP-L00001).....	82
III.B.2. Cost Estimates.....	83
No comments	
III.B.3. Results of Evaluation of Candidate Financial Test for Closure and Post-Closure Care.....	84
National Solid Wastes Management Association (FTMP-00020).....	84
Land and Lakes Company (FTMP-00024).....	87
III.B.4. Results of Sensitivity Analysis to Determine Effects of Corrective Action Costs on Test Performance.....	91
No comments	

III.B.5. Statement of Accounting Standards Number 106 (FASB 106)	92
American Institute of Certified Public Accountants (FTMP-00009)	92
City of Santa Clarita, California (Burke, Williams & Sorensen) (FTMP-00021)	93
III.B.6. Domestic Asset Requirement	94
No comments	
IV.A. Discussion of National Solid Waste Management Association Petition	95
National Solid Wastes Management Association (FTMP-00020)	95
IV.B. Comments on the Notice of Data Availability	95
Laidlaw Environmental Services, Inc. (FTMA-00001)	95
Texas Natural Resource Conservation Commission (FTMA-00002)	96
IV.C. The Meridan Test	98
National Solid Wastes Management Association (FTMP-00020)	98
Waste Management, Inc.(FTMP-L0001)	99
IV.C. Discounting Costs	101
No comments	
VIII. Economic and Regulatory Impact	102
Asset Guarantee Insurance Company (FTMP-00002)	102
Thomas, Stidham & Acree (FTMP-00004)	103
Van-American Insurance Company (FTMP-00005)	104
Environmental Compliance Services, Inc. (FTMP-00011)	105
Land and Lakes Company (FTMP-00024)	106
William R. Lambert (FTMP-L0003)	107
IX.A. General Support for Financial Test	110
Browning-Ferris Industries (FTMP-00010)	110
Coors Brewing Company (FTMP-00014)	110
Nebraska Department on Environmental Quality (FTMP-00016)	110
John Phillip Taylor (FTMP-00022)	110
IX.B. General Opposition to Financial Test	112
Asset Guarantee Insurance Company (FTMP-00003)	112
Frieh Insurance Corporation (FTMP-00008)	114
Michigan Department of Natural Resources (FTMP-00012)	114
The Solid Waste Association of North America (FTMP-00013)	119
William R. Lambert (FTMP-L0003)	121

IX.C. Other Issues.....	125
Frieh Insurance Corporation (FTMP-00007).....	125
American Institute of Certified Public Accountants (FTMP-00009).....	126